



**CONESTOGA-ROVERS
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September 9, 2013

Reference No. 006029-10

Mr. Regan S. Williams
State Project Coordinator
Ohio EPA - Division of Emergency & Remedial Response
2110 East Aurora Road
Twinsburg, Ohio 44087

Dear Mr. Williams:

Re: Annual Progress Report No. 18
Operation, Maintenance, and Monitoring
Summit National Superfund Site, Deerfield Township of Portage County, Ohio



In accordance with Paragraph XI.A of the Consent Decree for the Summit National Superfund Site (Site) in Deerfield Township of Portage County, Ohio, the Summit National Facility Trust (SNFT) hereby submits two copies of the Annual Progress Report No. 18 for the operation, maintenance, and monitoring activities at the Site for the period of September 1, 2012 to August 31, 2013.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Nicholas J. Schapman

NJS/po/Will-05
Encl.

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September 9, 2013

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Reference No. 006029-10

cc: Pablo Valentin, USEPA RPM (2 copies)
James Morris, USEPA Regional Counsel
Assistant Attorney General, Land and Natural Resources Division,
US Department of Justice
Supervisor, Office of Corrective Action, Director, State, Ohio EPA
Timothy Kern, Office of the Attorney General, State of Ohio
Jeff Sussman, SNFT (e-mail)
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Robert Casselberry, SNFT (e-mail)
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ANNUAL PROGRESS REPORT NO. 18

OPERATION, MAINTENANCE, AND MONITORING PERIOD SUMMIT NATIONAL SUPERFUND SITE

DEERFIELD, OHIO

PERIOD: SEPTEMBER 1, 2012 TO AUGUST 31, 2013

This annual progress report is submitted to the Ohio Environmental Protection Agency (OEPA) and the United States Environmental Protection Agency (USEPA) by the Summit National Facility Trust Fund (SNFT), as required by Paragraph XIA of the Consent Decree for the Summit National Superfund Site (Site) in Deerfield, Ohio.

A. GROUNDWATER EXTRACTION AND TREATMENT SYSTEM

1. The groundwater extraction and treatment system at the Site was shut down for the reporting period, as approved by OEPA. The system has been shut down since August 31, 2005.

B. GROUNDWATER MONITORING

1. Completed the 2013 annual groundwater hydraulic monitoring on April 29, 2013.
2. Completed the 2013 annual groundwater sampling on April 30, 2013.
3. Sampled purge water collected from the April 2013 groundwater sampling event and submitted samples to the analytical laboratory for disposal characterization. Transported and disposed of the purge water at Republic Services' Carbon Limestone Landfill in Lowellville, Ohio on August 23, 2013.
4. Drafted the April 2013 Groundwater Monitoring Report in August 2013 for submission to OEPA and USEPA in September 2013.

C. GENERAL SITE MAINTENANCE

1. SNFT provided general Site maintenance activities as required by the Operation, Maintenance, and Monitoring Plan (OMMP) for the Site for this reporting period, including weekly Site inspections.
2. The major maintenance activities associated with the groundwater extraction and treatment system at the Site consisted of routine site maintenance and included the following activities:
 - a. Performed routine inspection and maintenance on treatment building, including repaired roof leaks around HVAC unit, repaired HVAC unit, lubricated louvers and overhead door hinges, and caulked and installed weather-stripping around exterior doors.
 - b. Cut grass, as needed.

- c. Cleared trees and brush along the perimeter fence.
- d. Plowed snow on Site entrance, as needed.
- e. Rebuilt the backflow preventer on the potable water supply system located inside the treatment building.

D. GROUNDWATER MIGRATION EVALUATION

- 1. In the April 2009 groundwater monitoring report, SNFT recommended that the groundwater migration evaluation be extended to 2014 with annual groundwater monitoring and reporting. OEPA approved the continued shutdown of the groundwater extraction system with annual groundwater monitoring in a letter dated April 28, 2010.
- 2. In the April 2010, April 2011, and April 2012 groundwater monitoring reports, SNFT recommended that the groundwater migration evaluation be continued with annual groundwater monitoring and reporting.

E. MISCELLANEOUS

- 1. Prepared and submitted the September 1, 2011 through August 31, 2012 Annual Progress Report No. 17 to OEPA and USEPA on September 10, 2012.
- 2. Responded on October 30, 2013 to questions raised by OEPA in an October 4, 2012 letter following its review of the 2012 annual groundwater monitoring report.
- 3. Participated in a site inspection with USEPA and OEPA for the 5-year site review on December 11, 2012.
- 4. Conducted the 2013 annual surface water and sediment sampling at the confluence of the south and east drainage ditches adjacent to the Site on April 30, 2013. Analytical results will be submitted to OEPA and USEPA with the April 2013 Groundwater Monitoring Report in September 2013.
- 5. Conducted a limited hydrogeologic evaluation of the influence of the inactive pipe and media drain on groundwater flow. This was done to assist in evaluating possible benefits of a limited phytocontrol system for groundwater hydraulic control contemplated by SNFT that has been previously discussed with OEPA and USEPA. The evaluation included slug testing of select monitoring wells and sampling groundwater from two pipe-and-media drain manholes. The findings/results will be presented in the 2013 annual groundwater monitoring report.
- 6. SNFT cooperated with the United States Department of Justice to appoint a receiver to execute an Environmental Covenant on the Vasi property that is the Site. The receiver was appointed by federal district court and the Environmental Covenant was executed and recorded on June 5, 2013. The Environmental Covenant, based upon Ohio's Uniform Environmental Covenants Act, further secures activity and use limitations on the Site, grants EPA and the settling

defendants access to the Site for the purpose of conducting any activity related to the Decree, and specifies that such requirements shall "run with the land" and, hence, be binding upon any future owner of the Site.

7. Received the Summit National Fourth Five Year Review Report completed by USEPA (Pablo Valentin) on July 23, 2013.

F. ACTIVITIES SCHEDULED FOR NEXT REPORTING PERIOD

1. Continue general Site inspections, maintenance, and monitoring.
2. Finalize and distribute 2013 annual groundwater monitoring report.
3. Implement long-term stewardship procedures outlined by USEPA in the 2013 5-year Site review report, including submittal of amendments to the O&MM Plan to document the planned additional procedures.
4. Conduct the 2014 annual groundwater hydraulic monitoring (5-year event; therefore, monitor WTU, UIU, LIU, USU) and submit the results to OEPA and USEPA.
5. Conduct the 2014 annual groundwater quality monitoring (5-year event; therefore, analyze for the full Target Compound List/Target Analyte List, TCL/TAL) and submit the analytical results to OEPA and USEPA.
6. Conduct the 2014 annual sediment and surface water sampling at the confluence of the south and east drainage ditches, and submit the analytical results to OEPA and USEPA.
7. Conduct the 2014 residential groundwater well sampling (5-year event) at three neighboring residences and submit the analytical results to OEPA and USEPA.